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de la lutte antiparasitaire

Re-evaluation Note

REV2007-06

Aluminum and Magnesium Phosphide Interim Measures

The purpose of this Re-evaluation Note is to notify registrants, pesticide regulatory officials and the Canadian public of the status of the re-evaluation of aluminum and magnesium phosphide.

This Re-evaluation Note summarizes the major comments made to Health Canada's Pest Management Regulatory Agency (PMRA) in response to the Proposed Acceptability for Continuing Registration (PACR) document PACR2004-43, *Re-evaluation of Aluminum and Magnesium Phosphide*, published on 26 November 2004. This document also provides the PMRA's responses to the comments received.

Based on a review of currently available information, the PMRA is requiring that interim mitigation measures be implemented to further protect workers and bystanders in the vicinity of treated areas. Additional data are also required to conduct a refined human health risk assessment of aluminum and magnesium phosphide.

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1.0 Background

Aluminum and magnesium phosphide were re-evaluated by the PMRA under Re-evaluation Program 1 as described in Regulatory Directive DIR2001-03, *PMRA Re-evaluation Program*. The proposed regulatory decision for these active ingredients was published on 26 November 2004 in PACR2004-43. The proposed mitigation measures were based on conclusions from the 1998 United States Environmental Protection Agency (USEPA) Reregistration Eligibility Decision (RED) for aluminum and magnesium phosphide, taking into account the Canadian use pattern and Canadian issues.

Based on the potential health concerns identified in the USEPA RED, the PMRA proposed the same mitigation measures as those published in the RED, including the requirement of the 150 m buffer zone and 0.03 ppm phosphine gas re-entry level requirements.

This Re-evaluation Note presents a summary of the comments received during the consultation period for the PACR and the PMRA's response. This document also outlines the additional data that are required to conduct a refined assessment of human health risk associated with uses of products containing aluminum and magnesium phosphide as well as the interim mitigation measures required pending this final assessment.

2.0 Regulatory Strategy

In PACR2004-43, the proposed regulatory actions included a reduction of the phosphine gas exposure limit from 0.3 ppm to 0.03 ppm and addition of a 150-m buffer zone around treated sites during fumigation and aeration until the concentration of phosphine gas was within permitted limits.

In response to PACR2004-43, stakeholders have expressed concerns regarding the proposed buffer zone and lowered re-entry level, and have submitted information to the PMRA to support having these proposed requirements revised. It was indicated that the proposed 150-m buffer zone around treated sites is not practical due to the location of many mills in urban areas. Concern was also expressed that the proposed buffer zone is not based on monitoring data. With respect to the lowered monitoring/re-entry level, claims were made that it is not possible to measure phosphine gas concentrations in the field in the range of 0.01 to 0.03 ppm and that aeration to 0.03 ppm is not feasible in hot humid weather (i.e., would take too long). In addition, nearby workers would have to wear respiratory protection, which would increase their risk of heat exhaustion and injuries.

The PMRA acknowledges the concerns expressed in the comments received. However, uncertainties remain regarding the potential health risks to workers and bystanders from using products that include a registered use for fumigation of structures or other enclosures. As a result, submission of additional data, including toxicological and ambient air monitoring studies, will be required to enable a refined human health risk assessment in the long term. This will allow for determination of data-based buffer zones and an adequate re-entry/monitoring level. As it is anticipated that several years may be required to generate these data, interim measures are

proposed to mitigate potential health risks until such a time as a refined risk assessment can be completed. These interim measures include the following.

- Development, in consultation with the PMRA, of a product stewardship program stipulating that a fumigation management plan is required from users prior to any fumigation with metal phosphides or phosphine gas. A key component of the product stewardship program will be a guidance document for users on how to prepare a fumigation management plan. The fumigation management plan should include the following measures: site characterization; appropriate monitoring of air concentrations around the site; notification of all personnel; procedures for sealing the premises, treating with fumigant and postapplication operations; and an emergency response plan, including evacuation procedures. The requirement of a fumigation management plan is consistent with the USEPA Memorandum of Agreement, signed October 2000, in response to concerns raised and information submitted by stakeholders in response to the 1998 RED. A fumigation management plan was accepted in the Memorandum of Agreement as an alternative to the original mitigation measures, with provisions for an incident reporting program and exposure/ monitoring studies.
- The re-entry level must be lowered to the lowest practical level. It is essential that the lowest quantifiable level of phosphine that can be reliably measured under field conditions is clearly established in order to protect the health of workers and bystanders due to the potential health concerns that have been identified. The PMRA has noted that there appear to be phosphine monitors on the market that can measure levels of phosphine in the range of 0.01–0.03 ppm. However, due to the concerns raised by stakeholders regarding the feasibility of measuring levels in this range, a scientifically valid rationale must be submitted to the PMRA that clearly demonstrates why the value of 0.03 ppm cannot be reliably measured in the field and that clearly establishes the lowest level of quantification that can be measured in the field.
- The label amendments, other than the reduction of the phosphine gas exposure limit and the buffer zone around treated sites, required in Appendix II of PACR2004-43 have been further refined following the comments received. Responses to these comments are presented in Appendix I, and revised label statements are listed in Appendix II of this document.

3.0 Data Requirements

To allow the Agency to confirm the appropriateness of the above interim measures and to facilitate the establishment of a timeline for the data call-in, the PMRA is requesting additional information. Within 90 days of the publication of this Re-evaluation Note, registrants are required to submit the following:

- a scientifically valid rationale that clearly demonstrates why values in the range of 0.01 to 0.03 ppm cannot be measured in the field and that clearly establishes the lowest level of quantification if the required re-entry level of 0.01 to 0.03 ppm is not considered to be feasible;

- a draft guidance document on how to prepare fumigation management plans;
- any existing air monitoring data (e.g., from the United States) that were collected with a fumigation management plan in place; and
- an index of all existing toxicology and exposure data to facilitate the establishment of a time frame for the data call-in.

A timeline for submission to revise the label to include the revised re-entry level, the wording regarding the fumigation management plan and the requirements listed in Appendix II of this document will be established once the rationale regarding the re-entry level and the draft guidance document on how to prepare fumigation management plans have been received. At that time, registrants will be informed by letter of the timeline, specific requirements and regulatory options available to comply with the decision.

In the long term, registrants will be required to submit toxicological and ambient air monitoring studies for completing the aluminum and magnesium phosphide database, which the PMRA will use to conduct a refined health risk assessment of aluminum and magnesium phosphide.

The PMRA would require the data listed below to complete the toxicology and exposure database for the phosphine chemicals. Once an index of data has been received (within 90 days), the data required to complete the toxicology and exposure database will be confirmed, and a timeline for submission of these data will be established.

- DACO 4.5.9 Metabolism/toxicokinetics in mammals (laboratory animals)
- DACO 4.4.1 Chronic toxicity (2-year mouse study)
- DACO 4.5.3 Prenatal developmental toxicity (in the rabbit)
- DACO 4.5.14 Developmental neurotoxicity
- DACO 4.5.1 Two-generation reproductive toxicity study
- DACO 5.10 Ambient air monitoring study

The study for DACO 5.10 must be representative of typical fumigated sites and of Canadian climatic conditions; it is recommended that the applicant consult with the PMRA on the protocol to be used for the air monitoring study because the protocol must be approved by the PMRA prior to study initiation.

4.0 Supporting Documentation

PMRA documents, such as DIR2001-03, and DACO tables can be found on our website at www.pmra-arla.gc.ca/english/index-e.html. PMRA documents are also available through the Pest Management Information Service. Phone: 1-800-267-6315 within Canada or 1-613-736-3799 outside Canada (long distance charges apply); fax: 613-736-3798; e-mail: pmra_infoserv@hc-sc.gc.ca.

The USEPA RED document *Aluminum and Magnesium Phosphide* is available on the Office of Pesticide Programs' website at www.epa.gov/pesticides/reregistration under Chemical Status.

Appendix I

1.0 Comments Regarding Safety Recommendations

1.1 Comment Regarding the Presence of at Least Two Persons During Fumigation of Structures

At least two persons, a certified applicator and trained person, or two trained persons under the direct supervision of the certified applicator must be present during fumigation of structures when entry into the structure for application of the fumigant is required.

Confirmation that two persons are not required to be present when fumigating rodent burrows was requested.

Response

This requirement is only for products registered for fumigation of structures or other enclosures (refer to Appendix II for a detailed list of label amendments).

1.2 Comments Regarding Notification of Nearby Residents

All residents within 225 m of a fumigated structure/site must be notified 24 hours in advance of the fumigation.

The USEPA has not required this type of notification to be added to the American labels. In lieu of the above recommendation, the label should require that appropriate local officials (fire, police, etc.) be notified of the impending fumigation and be provided with a Material Safety Data Sheet (MSDS), an applicator's manual for the product and any other technical information deemed useful. An offer to review this information with the local officials should also be made. In addition, in consultation with company officials, develop procedures for local authorities to notify nearby residents in the event of an emergency.

Response

In the 1998 RED, the USEPA proposed a requirement that the certified applicator notify residents within 750 feet (i.e., 225 m) of a fumigated structure so that residents near structures to be fumigated could make decisions regarding temporarily leaving their property during fumigation to protect themselves from possible phosphine exposure. Such notification would also be required for commercial and industrial sites that would be near a planned fumigation. This proposal was discussed as part of the USEPA public review and stakeholder meeting process. In the resulting Memorandum of Agreement (8 November 2000), it was determined that notification of local residents would be addressed via a fumigation management plan that would be required prior to each fumigation.

Similarly, the PMRA is no longer requiring this statement on the label because this issue will also be addressed in Canada through a fumigation management plan.

1.3 Comment Regarding Voice/Visual Contact During Fumigation

The certified applicator must maintain visual and/or voice contact with all fumigation workers during the application of the fumigants.

Considering that fumigators may be wearing self-contained breathing apparatus (SCBA) or full-face respirators while the fumigant is applied, the proposal for voice contact (assuming two-way radio is allowed) is not practical.

Response

If voice contact is not feasible, visual contact is considered appropriate.

1.4 Comment Regarding Theft of Product Wording

Report all thefts of product immediately to proper local officials.

The following wording, as per the American applicator's manual, should be used:

Theft of products: Immediately report to the local police department thefts of metal phosphide fumigants.

Response

As the suggested modified wording is more precise, the PMRA agrees that it is acceptable. Therefore, the label will be modified as per the suggested wording above.

1.5 Comment Regarding Direct Contact With Food

Under no circumstances shall food, feed and/or raw agricultural commodities that may be used directly as foods come into contact with aluminum phosphide.

Avoidance with direct contact with food should also include magnesium phosphide.

Response

The PMRA agrees that avoidance with direct contact with food should also include magnesium phosphide. Therefore, the label will be modified as per the suggested wording above.

2.0 Comment Regarding Placarding of Fumigated Areas

The current ECO₂FUME label (i.e., phosphine gas) requires placards in English and in French. What is the language requirement for placards on aluminum and magnesium phosphide products?

Furthermore, many of the in-transit railcar fumigations originate in the United States and contain placards in English and Spanish. What are the requirements for provincially certified/licenced applicators who take control of railcars labelled in the United States containing products that enter elevators, mills and distribution sites in Canada?

Response

The language requirement for placards on current aluminum and magnesium phosphide products is not specified, and a requirement for placards bearing instructions in both English and French was not recommended in PACR2004-43. However, there is an implied requirement that placards will bear instructions that can be understood by nearby workers.

With respect to provincially certified applicators at elevators, mills and distribution sites in Canada who take control of American-labelled railcars which may contain placards in English and Spanish, the PMRA does not have control over the language requirements of placards coming from another country. However, the current applicator's manual specifies that placards should not be removed until the treated commodity is aerated down to 0.3 ppm hydrogen phosphide or less. For detailed instructions please refer to the applicator's manual,
PLACARDING OF FUMIGATED AREAS.

3.0 Comments Regarding Fumigation of Transport Vehicles**3.1 Comment Regarding Written Notification of Transport Vehicles**

Written notification must be provided to the receiver of railcars, railroad boxcars, shipping containers and other vehicles that are being fumigated in transit. Notification must be made prior to the actual receipt of a fumigated vehicle or container by a consignee. A copy of the applicator's manual must precede or accompany all transportation containers or vehicles.

Recommend that the content of the written notification required needs to be prescribed. In addition, the details of whom is to be responsible for sending the applicator's manual, how the manual can be sent (e.g., hard copy and/or electronic), who is to receive the document and for what purposes should be indicated on the label.

Response

The purpose of the written notification is to make certain that the receiver of the fumigated vehicle is aware of the fumigation and has an adequate program in place to properly receive a fumigated vehicle. However, the precise content of the notification is left to the discretion of the sender (the shipper or applicator).

The applicator's manual would be sent by the shipper or the applicator. A hard copy can be sent by courier or mail, or it can be sent electronically via e-mail or by any other method deemed practical by both the sender and the receiver.

3.2 Comment Regarding Training of Aerators

Upon receipt of the railcar, railroad boxcars, shipping containers and other vehicles, a trained person must perform the aeration process and must document in writing that monitoring has been conducted and that aeration has been completed. This training shall include, at a minimum, proper and safe aeration handling procedures.

Recommend that training requirements should be more specific and include who is authorized to provide the training and what documentation proves that training has been successfully completed by a "trained person". Requiring provincial certification/licensing would be more enforceable. Consideration should be given to require at least two appropriately certified/licensed persons on site to open up fumigated containers for aeration purposes.

Response

Two persons are not required for aeration of a vehicle with commodities under fumigation if entry into the vehicle is not required.

In Canada, the consignee (i.e., receiver) is responsible for the proper handling of the treated vehicle. Current Canadian labels contain instructions for the consignee in the applicator's manual under Fumigation of Railcars, Containers, Trucks, Vans and Other Transport Vehicles. To ensure that the person doing the aerating is properly trained the wording in the applicator's manual must be modified as follows:

Proper handling of treated railcars, containers and other transport vehicles shipped piggyback by rail, at their destination is the responsibility of the consignee. Upon receipt of the railcar, railroad boxcars, shipping containers and other vehicles, a trained person must perform the aeration process. The trained person must be provincially licensed or have other documented authorized training recognized by the province and must be familiar with the properties of hydrogen phosphide fumigants, worker exposure limits, required personal protective equipment, symptoms and first aid treatment for hydrogen phosphide poisoning, and must know how to take gas concentration measurements. A training completion date must be logged and maintained in the employee's safety training record. Upon receipt of a fumigated commodity, it must be documented in writing that the monitoring has been conducted and that aeration has been completed.

3.3 Comment Regarding Documentation of Monitoring and Aeration

The USEPA does not require written documentation of monitoring and aeration following receipt of railcars fumigated in transit. It should not be required in Canada because use patterns are similar.

Response

The USEPA required written documentation of monitoring and aeration following receipt of railcars fumigated in-transit as per the 2003 Memorandum of Agreement between the USEPA and signatory registrants of phosphine based fumigants. The PMRA is not aware of any changes to this decision; therefore, this will continue to be a requirement on Canadian end-use product labels of phosphine-based products for railcar fumigation.

3.4 Comment Regarding the Fumigation of Ships

Recommend that the in-transit fumigation of raw products in ship holds, mobile carriers carried by ships and fumigation of ships at dockside, etc., needs to be addressed specifically on the label. The impact on the *Canada Shipping Act* and Ship Fumigation Regulations should be mentioned.

Response

The in-transit fumigation of ships, pre-voyage fumigation procedures and the in-transit fumigation of containers aboard ships are specifically addressed in the applicator's manual of all relevant aluminum and magnesium phosphide products registered in Canada, in a section titled Fumigation of Ships. This section of the applicator's manual specifies that "shipboard, in-transit ship or shiphold fumigation is also governed by Transport Canada Ship Safety Regulations. Refer to and comply with those Regulations and Ship Safety Bulletins prior to fumigation."

3.5 Comment Regarding Security of Transport Vehicles

United States Department of Homeland Security recommendations allow non-preformed cable (NPC) single-use barrier security seal systems. Label improvements should be considered in Canada to address security measures regarding the securing of doors and hatches of in-transit railcars under fumigation originating in Canada.

Response

Security measures regarding in-transit railcars do not fall under the jurisdiction of the PMRA. Transport Canada is responsible for the development of regulations and national standards that contribute to safety and security in rail transport as well as aviation, marine and road modes of transport.

4.0 Comments Regarding Environmental Precautions

4.1 Comment Regarding Contamination of Water

DO NOT contaminate irrigation or drinking water supplies or aquatic habitats such as lakes, rivers, sloughs, ponds, prairie potholes, creeks, marshes, streams, reservoirs and wetlands by cleaning of equipment or disposal of wastes.

This statement should not be required on the ECO₂FUME Fumigant Gas product label because there is no equipment to be cleaned (empty cylinders are returned to the company) and there is no waste to dispose of because the product is applied directly as a gas from cylinders.

Response

This is a standard label statement that is required by the PMRA on all pesticide products registered in Canada.

4.2 Comment Regarding the Presence of Birds

Carefully inspect the outside and inside of the structure to be treated prior to application of the fumigant to ensure the absence of nesting or roosting birds. Avoid application if birds are present.

The requirement to avoid application if birds are present inside/outside of the structure will prohibit the fumigation of all grain elevators and mills because pigeons, starlings and sparrows are so common at these facilities. It is unclear if the birds scared away just prior to starting the fumigation that return will constitute a label violation.

Response

The wording recommended in PACR2004-43 reflects current standards, but has the same meaning as the label statements currently included on Canadian labels. The requirement to *avoid application if birds are present* indicates that every effort should be made to ensure birds are absent. However, it is recognized that it may not be possible to completely maintain the absence of birds.

5.0 Comments Regarding Use in Rodent Burrows

5.1 Comment Regarding Wearing Respirator During Application to Burrows

Wear a National Institute of Safety and Health (NIOSH) approved respirator during application to rodent burrows.

A reason should be provided on the label for wearing proper respiratory equipment. Furthermore, the USEPA does not require respiratory protection for outdoor applications.

Response

Proper respiratory equipment (i.e., a NIOSH-approved respirator) was required as per PACR2004-43. This was based on a quantitative risk assessment, as described in the 1998 RED, where hand application of aluminum and magnesium phosphide to animal burrows resulted in concentrations in the applicators breathing zone that were of concern. Although the respiratory equipment was no longer required by the USEPA in the Memorandum of Agreement of 2000, the PMRA still considers that there is a potential health risk. As a result, respiratory protection will continue to be required on Canadian end-use product labels that have a registered rodent burrow use.

5.2 Comment Regarding Clarification of Wording

This product must not be applied into a burrow system that is within 5 m of a building, especially a residence, that is, or may be, occupied by humans and/or animals.

Recommend revising the above statement to read:

This product must not be applied into a burrow system that is within five metres of **any** building, especially a residence, that is, or may be, occupied by humans and/or animals **during the fumigation**.

Response

The five-metre distance from a building is intended to prevent nearby residents or other bystanders from possible exposure to phosphine gas. The wording "during the fumigation" would imply that a burrow less than five metres away from an unoccupied building could be fumigated and that occupants of such a building could return as soon as fumigation is complete. This may not be sufficient to prevent unintended exposure, and the statement proposed in PACR2004-43 is required.

5.3 Comment Regarding Distance from Burrow to Building

This product must not be applied into a burrow system that is within 5 m of a building, especially a residence, that is, or may be, occupied by humans and/or animals.

Do not apply to burrows that open under or into a building, especially a residence that is, or may be, occupied by humans and/or animals.

A 10-metre distance may be more appropriate. The fumigator should be required to check any buildings located within a 20-metre distance for burrow exits around the foundation, under porches and steps, raised floors over soil, within soil-filled crawl spaces, etc., prior to introducing the tablets.

Response

In the 1998 RED, the USEPA proposed that treatment of burrows for rodent control be prohibited within 100 feet (33 m) from homes or commercial facilities such as hospitals, schools and nursing homes. This proposal was based on a concern for the possibility of unintended exposure to residents or other bystanders. However, in the 2003 Memorandum of Agreement, this proposal was amended to prohibit application to burrows within 15 feet (5 m) of a building **and** to burrows that open under or into a building, especially a residence, that are, or may be, occupied by humans and/or animals. The above wording, proposed in PACR2004-43, is considered adequate by the PMRA and will continue to be required.

5.4 Comment Regarding Appropriate Section of the Applicator's Manual to Provide to Customer

Before treating a rodent burrow on a property containing an inhabited structure, the applicant must provide the customer with the appropriate section of the applicator's manual.

Please clarify as to what "appropriate section" of the applicator's manual must be provided to the customer and the purpose of so doing.

Response

The purpose of providing the customer with the appropriate section of the applicator's manual is to give the customer information regarding the potential dangers of aluminum phosphide and the resulting phosphine gas that is released. At a minimum, the applicant must provide the customer with the sections of the applicator's manual (or the label) pertaining to **PRECAUTIONS**, **TOXICOLOGICAL INFORMATION** and **FIRST AID**.

6.0 Comment Regarding Maximum Residue Limits

The USEPA re-evaluated and republished tolerances for phosphine during the RED process. It is recommended that the PMRA take into consideration the tolerances established in the United States when considering changes to Canadian maximum residue limits (MRLs).

Response

Aluminum and magnesium phosphide are currently registered for use on a number of stored food and feed crops in Canada, and no MRLs are currently specified for phosphine in Table II, Division 15 of the Canadian Food and Drug Regulations. Currently, any residues of phosphine on food grown in or imported into Canada must not exceed 0.1 ppm, a general MRL specified in subsection B.15.002(1) of the Food and Drug Regulations. However, changes to this general MRL may be implemented in the future, as indicated in Discussion Document DIS2006-01, *Revocation of 0.1 ppm as a General Maximum Residue Limit for Food Pesticide Residues [Regulation B.15.002(1)]*. A transition strategy will be established to allow permanent MRLs to be promulgated when the general MRL is revoked.

Appendix II Revised Labelling Requirements

1.0 Requirements for All Products

The following statements are required on the labels of all end-use products containing aluminum or magnesium phosphide.

SAFETY RECOMMENDATIONS

Theft of products: Immediately report to the local police department thefts of metal phosphide fumigants.

Registrant must be informed of any incident involving the use of this product.

DIRECTIONS FOR USE

Piling of tablets, pellets or bags or the addition of liquid to the product is prohibited.

ENVIRONMENTAL HAZARDS

DO NOT contaminate irrigation or drinking water supplies or aquatic habitats such as lakes, rivers, sloughs, ponds, prairie potholes, creeks, marshes, streams, reservoirs and wetlands by cleaning of equipment or disposal of wastes.

2.0 Requirements for Fumigation of Structures or Other Enclosures

The following statements are required on the labels of all end-use products containing aluminum or magnesium phosphide that are registered for use for fumigation of structures or other enclosures.

SAFETY RECOMMENDATIONS

At least two persons, a certified applicator and trained person, or two trained persons under the direct supervision of the certified applicator must be present during fumigation of structures when entry into the structure for application of the fumigant is required.

At least two persons, a certified applicator and trained person, or two trained persons under the direct supervision of a certified applicator, must be present and must wear the proper safety equipment when a structure that is under fumigation is to be entered.

The certified applicator must maintain visual and/or voice contact with all fumigation workers during the application of the fumigants.

Under no circumstances shall food, feed and/or raw agricultural commodities that may be used directly as foods come into contact with aluminum or magnesium phosphide.

PLACARDING OF FUMIGATED AREAS

Signs are to be made of substantial material that can be expected to withstand adverse weather conditions.

Placards must bear a 24-hour emergency response telephone number.

APPLICATOR AND WORKER EXPOSURE

The level of phosphine gas may be higher at the core of the commodity than the surrounding air. Monitoring is required when unloading or otherwise disturbing a commodity that has been fumigated to ensure that liberation of gas from the treated commodity does not result in unacceptable levels of hydrogen phosphide.

3.0 Requirements for Fumigation of Railcars, Containers, Trucks, Vans and Other Transport Vehicles

The following statements are required on the labels of all end-use products containing aluminum or magnesium phosphide that are registered for use for fumigation of railcars, containers, trucks, vans and other transport vehicles.

Written notification must be provided to the receiver of railcars, railroad boxcars, shipping containers and other vehicles that are being fumigated in transit. Notification must be made prior to the actual receipt of a fumigated vehicle or container by a consignee. A copy of the applicator's manual must precede or accompany all transportation containers or vehicles.

Proper handling of treated railcars, containers and other transport vehicles shipped piggyback by rail, at their destination is the responsibility of the consignee. Upon receipt of the railcar, railroad boxcars, shipping containers and other vehicles, a trained person must perform the aeration process. The trained person must be provincially licensed or have other documented authorized training recognized by the province or territory and must be familiar with the properties of hydrogen phosphide fumigants, worker exposure limits, required personal protective equipment, symptoms and first aid treatment for hydrogen phosphide poisoning, and must know how to take gas concentration measurements. A training completion date must be logged and maintained in the employee's safety training record. Upon receipt of a fumigated commodity, it must be documented in writing that the monitoring has been conducted and that aeration has been completed.

Aeration of railcars, railroad boxcars or shipping containers is prohibited en route.

4.0 Requirements for Rodent Burrows

The following statements are required on the labels of all end-use products containing aluminum or magnesium phosphide that are registered for use in rodent burrows.

PRECAUTIONS

Wear a National Institute for Occupational Safety and Health (NIOSH) approved respirator during application to rodent burrows.

DIRECTIONS FOR USE

This product must not be applied into a burrow system that is within 5 m of a building, especially a residence, that is, or may be, occupied by humans and/or animals.

Do not apply to burrows that open under or into a building, especially a residence that is, or may be, occupied by humans and/or animals.

Document any burrows that open under or into occupied buildings.

Before treating a rodent burrow on a property containing an inhabited structure, the applicant must provide the customer with the appropriate section of the applicator's manual.

ENVIRONMENTAL HAZARDS

To avoid unintentional poisonings of endangered, threatened or vulnerable species, do not apply this product without confirming that the burrow, den or tunnel is inhabited by the pest.

